

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JEMIKA JOHNSON AND,
ESTATE OF BABY JOY JOHNSON

Plaintiffs,

V.

RAPPAHANNOCK REGIONAL
JAIL AUTHORITY, ET AL.

Defendants.

Civil Action No. 1:23-cv-01024

DEFENDANTS' MOTION TO DISMISS

Defendants Paul Wallace (“Wallace”), Gregory Coleman (“Coleman”), Tony Coles (“Coles”), Joseph Jackson (“Jackson”), Patrick O’Connor (“O’Connor”), Terrence Shell (“Shell”), Shawn Connolly (“Connolly”), Stephenie Brown (“Brown”), Peter Teye (“Teye”), and Rappahannock Regional Jail Authority (“RRJ”) (collectively “Defendants”), by counsel, and pursuant to Fed. R. Civ. P. 12(b)(6) and other applicable law, move this Honorable Court to enter an Order dismissing with prejudice Counts II, III, IV, and V against them because Plaintiff fails to state a claim upon which this Court may grant relief as to these Defendants. To support their Motion, Defendants rely upon their contemporaneously filed Memorandum in Support.

**WALLACE
COLEMAN
COLES
JACKSON
O'CONNOR
SHELL
CONNOLLY
BROWN
TEYE
RAPPAHANNOCK REGIONAL JAIL AUTHORITY**

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of May, 2024, I electronically filed the foregoing pleading using the CM/ECF System, which will send notifications of the filing to all counsel of record:

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